



Department of Energy

Washington, DC 20585

QA: QA

FEB 13 2002

C. M. Sparks
Bechtel SAIC Company, LLC
1180 Town Center Drive, M/S 763
Las Vegas, NV 89144

**VERIFICATION OF CORRECTIVE ACTION AND CLOSURE OF DEFICIENCY
REPORT (DR) BSC-02-D-057 RESULTING FROM THE OFFICE OF QUALITY
ASSURANCE (OQA) AUDIT BSC-ARC-02-03**

The OQA staff has evaluated the corrective action of DR BSC-02-D-057 and determined the results to be satisfactory. As a result, the DR is considered closed.

If you have any questions, please contact either James Blaylock at (702) 794-1420 or Dennis C. Threatt at (702) 794-1495.

OQA:JB-0644

James Blaylock
Ram Murthy, Acting Director
Office of Quality Assurance

Enclosure:
DR BSC-02-D-057



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*WM-11
NM5507*

FEB 13 2002

cc w/encl:

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OFFICE OF CIVILIAN
RADIOACTIVE WASTE MANAGEMENT
U.S. DEPARTMENT OF ENERGY
WASHINGTON, D.C.8. ☒ DEFICIENCY REPORT
☐ CORRECTIVE ACTION
REPORT
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DEFICIENCY/CORRECTIVE ACTION REPORT

D601/3/02

1. Controlling Document: AP-2.20Q, Revision 0, ICN 1, Self-Assessments		2. Related Report No.: BSC-ARC-02-03	
3. Responsible Organization: BSC		4. Discussed With: Mike Sparks, Ralph Dressel, Don Krisha	
5. Requirement: Para. 5.4.3 a) Provide a copy of the approved Self-Assessment Report to the next higher level of management of the organization being assessed (e.g., Director, Assistant Manager), to the Self-Assessment Coordinator, to the Director, DOE/Office of Quality Assurance if the self-assessment is assessing the effectiveness of corrective actions, and others as appropriate. Para. 5.4.3 b) Enter any condition or recommendation identified by the self-assessment into the Condition/Issue Identification and Reporting/Resolution system in accordance with procedure AP-REG-004. Para. 6.1 QA RECORDS Individual Records: Self-Assessment Report related to QARD work activities			
6. Description of Condition: Contrary to the above requirements: Self-Assessment SA-SSFS-2001-010 states in Section 3.C) that the Self-Assessment evaluated the effectiveness of corrective actions for DRs LVMO-99-D-072, LVMO-00-D-076, and LVMO-01-D-013. However, Section 10 of the report does not show distribution to the Director, OQA. Condition # 3 in the Self-Assessment Report identified that Field Engineering sign-offs were not completed for the Work Orders evaluated. It was stated that this condition would be entered into the CIRS database as a deficiency, however, there is no evidence that this was accomplished. This condition was the subject of DR YMSCO-01-D-108 and apparently corrective action did not result in correction of the condition. The Self-Assessment Report was submitted to the RPC as a non-QA record although the assessment apparently involved activities subject to the QARD.			
7. Initiator: Dennis Threatt <i>Dennis Threatt</i> Date 12-20-2001		9. Does a stop work condition exist? (Not required for a DR) <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes, Check One: <input type="checkbox"/> A <input type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/> D	
10. Recommended Actions: Identify in the Self-Assessment Report when the work being assessed is subject to the QARD.			
11. QA Review: <i>Dennis Threatt</i> QAR Dennis Threatt Date 1-3-02		12. Response Due Date: 10 working days from issuance	
13. DOQA Issuance Approval: Printed Name Ram Murthy Signature <i>James Blaylock for</i> Date 1/8/02			
22. Corrective Actions Verified QAR <i>Dennis Threatt</i> Date 2/5/2002		23. Closure Approved by: DOQA <i>James Blaylock for</i> Date 2/13/02	

TYPE RESPONSE:

- ☐ Initial
- ☒ Complete
- ☐ Amended

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14a. Immediate Actions:

Condition #3 identified during the Self Assessment (SA) was entered into the CIRS system as Item # 2251 and was closed 1/3/02.

Compliance Date: 12/18/01

14. Remedial Actions:

Item 1) No action needed.

Item 2) See Block 14a.

Item 3) No action needed.

15. Extent of Condition:

As detailed in Block 16.CAUSE. Self Assessment SA-SSFS-2001-010 was a Non-Q Self Assessment. No Q activities were assessed and there is no impact on 'Q' quality.

16. Cause: (Attach results of root cause determination prepared in accordance with AP-16.4Q for a significant deficiency.)

See continuation page.

17. Action to Preclude Recurrence:

The Site Operation Manager has issued a directive (see attached memo # 11621158, Sparks to Distribution) to all identified Self Assessment Lead personnel to include, in each Self Assessment Report, sufficient information (in the Purpose, Scope, Objectives section) to positively identify the Q or Non-Q applicability of the assessment.

18. Due Date: 1/16/02

- ☐ For submittal of complete response
- ☒ For completion of corrective action

19. Response by: Ralph Dresel

Ralph Dresel

Date

1.17.02

Phone

5.7366

BSC QA H For J. THORSON 1/16/02

20. Evaluation:

☒ Accept☐ Partially Accept☐ Reject

QAR

*Dennis Stewart*Date *1-24-02*

21. Concurrence:

DOQA

James Blaylock

Date

2/1/02

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8. ☒ DR/CAR
☐ Stop Work Order

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DEFICIENCY/CORRECTIVE ACTION REPORT/STOP WORK ORDER CONTINUATION PAGE

Block 16. Cause (continued):

General comment:

During investigation activities to determine the cause of the cited conditions (see "Cause Analysis" below) two Self Assessment process factors promoting confusion were noted as follows:

- a) The Self Assessment Database in the CIRS system provides a synopsis of Self Assessments conducted and is for reference only. However, this database is consulted for some planning activities and its accuracy is presumed to be sufficient for this function. Unfortunately errors do occur as was the case with Self Assessment SA-SSFS-2001-010. Although the SA was Non-Q in nature, as indicated on the report cover sheet per procedure, it was entered into the Self Assessment Database as a 'Q' assessment.
- b) It is apparent that the text (Purpose, Scope, Objectives) of some Self Assessments do not adequately identify whether the SA is Q or Non-Q in nature. The only required indicator of this status is the QA designator on the report cover sheet. This lack of text information coupled with the potential for error mentioned above can lead to inaccurate conclusions such as was encountered with this DR.

Cause Analysis:

Item 1) This item was identified as a deficiency because of the inappropriate use of the terms "corrective action effectiveness" and "effectiveness of corrective actions" used in SA report sections 3, 4 and 8. However, in actual application, the only activity regarding corrective actions was the review of the NCR and DR databases for repeat deficiencies as allowed by AP-2.20Q, Rev. 0, ICN 1 (AP-2.20Q), paragraph 5.2b and as stated in SA report section 8, last paragraph. It is our opinion that this review of the NCR and DR databases for repeat deficiencies does not fall under the jurisdiction of AP-2.20Q, paragraph 5.4.3a. This AP-2.20Q requirement requires a copy of the SA Report to be forwarded to the Director, OQA "if the self-assessment is assessing the effectiveness of corrective actions".

Item 2) Failure to enter Condition #3 in the CIRS system was due to human error. The SA identified a Non-Q deficiency in that the completed Work Orders reviewed did not contain a sign-off for Field Engineering (FE) when the work completed was for a FE designed item. This condition was included in the SA Report in sections 4, 6, 7 and 8. Section 7 of the SA stated that this deficient condition would be entered into the CIRS system as a deficiency. The error occurred when each SA participant assumed that the other had made the necessary entry. Because condition 3 had been evaluated and determined to be reportable in the CIRS system, as reflected in the SA, we do not believe this to be a repeat of the situation addressed in DR YMSCO-01-D-108. Upon verification that the entry had not been made, the item was entered into CIRS as item # 2251 and was closed on 1/3/02.

See continuation page.

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Block 16. Cause (continued):

Item 3) Self Assessment # SA-SSFS-2001-010, FIELD ENGINEERING INVOLVEMENT IN WORK CONTROL AND PROCESS was confined to Non-Q activities as indicated by the procedurally required Records indicator of "QA:N/A" on the first page (reference AP-2.20Q, Rev. 0, ICN 1, SELF ASSESSMENTS, Attachment 2, SELF ASSESSMENT REPORT FORMAT AND GUIDELINES). The Self Assessment, section 4, EXECUTIVE SUMMARY, second paragraph states:

"Two (2) Field Engineering output documents were viewed for confirmation of action. These consisted of field Engineering sign off of completed Work Orders and development of Field Engineering Technical Documents (FETDs) evidencing Work Order review".

At the time of the assessment there were no completed "Q" Work Orders to review. Since none of the completed Non-Q Work Orders that were reviewed had the required Field Engineering sign-off it was considered unnecessary to list the numbers of the Work Orders reviewed since all such Work Orders were considered affected. The five (5) FETDs reviewed were Non-Q and their identification was listed.

As stated in Item 1 above, it is our opinion that the act of consulting the NCR and DR databases to see if there were any repeat "like" deficiencies does not make the assessment Q related.

Since the activity covered by this DR was Non-Q there is no impact to 'Q' related Quality.



Interoffice Memorandum

QA: N/A

To: Distribution – Self Assessment
Lead Personnel

No.: 116021158

From: Charles M. Sparks *CMS*

Date: 16 Jan. 02

Re: Self Assessments

CC: See below

This directive is issued to all identified Self Assessment Lead personnel to include, in each Self Assessment Report, sufficient information (in the Purpose, Scope, Objectives section) to positively identify the Q or Non-Q applicability of the assessment.

If you have questions or comments please contact Ralph Dresel at 5-7366.

CMS:ger

Distribution:

Howard R. Cox, SITE/755
Randolph B. Cunningham, SITE/760
Dwayne D. Davis, SITE/763
Ralph R Dresel, SITE/760
Richard B. Foster, SITE/760
David E. Frederici, SITE/720
Errol M. Gardiner, SITE/717
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Rudolph L. Johnson, SITE/760
Terry W. Lewis, SITE/717
Gregg A. Mickelson, SITE/ 761
Nelson O'Connor, SUM1/423
Charles M. Sparks, SITE/763

cc:

Patricia J. Jakus, SITE/760
Robert I. Law, SITE/761
Thomas M. Leonard, SUM1/423
Thomas A. Peterson, SUM1/423
Rufus L. Taylor, III, SUM1/423
RPC = 1 page

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DEFICIENCY/CORRECTIVE ACTION REPORT/STOP WORK ORDER CONTINUATION PAGE

Corrective action for this DR required Condition # 3 from Self Assessment SA-SSFS-2001-010 to be entered into the CIRS database and a memo from the Site Operation Manager to be issued to all identified Self Assessment Lead personnel to include, in each Self Assessment Report, sufficient information (in the Purpose, Scope, Objectives section) to positively identify the Q or Non-Q applicability of the assessment. A review of the CIRS database revealed that Condition # 3 was entered into CIRS as item # 2251 and was closed on 1/3/02. The memo from the Site Operation Manager (memo # 11621158, Sparks to Distribution) was issued on 1/16/2002 and a copy was attached to the complete response to this DR.

Based on satisfactory completion of corrective action, it is recommended that this DR be closed.

Dennis Threath *2/5/2002*
Dennis Threath, QAR Date